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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

JAIME LOPEZ PAEZ,	)	No. C 07-5240 MJJ
	)	
Plaintiff,	)	
	)	
v.	)	OPPOSITION TO PRO HAC VICE
	)	ADMISSION
MICHAEL CHERTOFF, Secretary,	)	
Department of Homeland Security; EMILIO	)	
GONZALEZ, USCIS Director; DAVID	)	
STILL, District Director, DHS,	)	
	)	
Defendants.	)	

Defendants hereby oppose the application by Plaintiff's counsel, Jeffrey Griffiths, for pro hac vice admission. The application appears to be in violation of Civ. L.R. 11-3(b), which disqualifies applicants who reside in the State of California or who are regularly engaged in the practice of law in the State of California. Plaintiff's counsel appears to meet both disqualification factors. Moreover, he has apparently appeared before the Northern District of California on at least seven other cases. See Abouraya v. Chertoff, No. 07-0561 JCS; Abdi v. Chertoff, No. 07-0562-EDL; Sultanzai v. Chertoff, No. 07-2289 JL; Maghsoodlou v. Chertoff, 07-0237 EMC; Afsari v.

<sup>1</sup>Defendants appear specially for the purpose of opposing Plaintiff's counsel's application for pro hac vice admission. Defendants reserve the right to assert all appropriate defenses in any responsive pleading.

1 Chertoff, No. 07-3028 MEJ; Kamrava v. Chertoff, No. 07-3946 BZ; Sedigh v. Chertoff, No. 07-5468  
2 CW.

3 As explained by the Ninth Circuit, “pro hac vice refers to an attorney who is admitted  
4 temporarily to practice in a jurisdiction for the purpose of participating in a particular case.” Gallo  
5 v. United States Dist. Court for D. Ariz., 349 F.3d 1169, 1173 n.1 (9th Cir. 2003) (citing Blacks’  
6 Law Dictionary 1227 (7th ed. 1999)). As demonstrated above, Mr. Griffiths has requested  
7 admission on a number of cases. His repeated pro hac vice applications frustrate both the local rule  
8 and the California Business & Professions Code. See Civ. L. R. 11-3(b); Cal. Bus. & Prof. Code  
9 § 6125. Defendants respectfully request the Court to deny Mr. Griffiths’ application.

10 Dated: October 30, 2007

Respectfully submitted,

11 SCOTT N. SCHOOLS  
12 United States Attorney

13 /s/  
14 MELANIE L. PROCTOR  
15 Assistant U.S. Attorney  
16 Attorneys for Defendants  
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